

29th September 2025

South Dublin County Council,
Senior Executive Officer,
Forward Planning Section,
Land Use Planning & Transportation Department,
County Hall,
Tallaght,
Dublin 24 A3XC.

Re: Proposed Variation No. 1 to the South Dublin County Development Plan 2022-2028 (Draft Clondalkin Local Planning Framework)

A chara,

Thank you for your authority's work in preparing the Proposed Variation No. 1 (proposed Variation) to the South Dublin County Development Plan 2022-2028 (County Development Plan).

As South Dublin County Council (Planning Authority) is aware, a key function of the Office of the Planning Regulator (Office) is the assessment of statutory plans to ensure consistency with legislative and policy requirements relating to planning. The Office has evaluated and assessed the proposed Variation under the provisions of sections 31AM(1) and 31AM(2) of the Planning and Development Act 2000, as amended (Act) and this submission has been prepared accordingly.

Recommendations issued by the Office relate to clear breaches of the relevant legislative provisions, of the national or regional policy framework and/or of the policy of Government, as set out in the Ministerial guidelines under section 28. As such, planning authorities are requested to implement or address recommendation(s) made by the Office in order to ensure consistency with the relevant policy and legislative provisions.

Observations take the form of a request for further information, justification on a particular matter, or clarification regarding particular provisions of a plan on issues that are required to ensure alignment with policy and legislative provisions. Planning authorities are advised by the Office to action an observation.

A submission also can include advice on matters that the Office considers would contribute positively to the proper planning and sustainable development of the area. Planning authorities are requested by the Office to give full consideration to the advice contained in a submission.

On adoption of the proposed Variation, the Office will consider whether the plan has been made in a manner consistent with the recommendations of the Office and whether the plan sets out an overall strategy for the proper planning and development of the area concerned.

Overview

The Office acknowledges and welcomes the overall approach of your authority in the preparation of the proposed Variation and in addressing the National Planning Framework First Revision (2025) and the Regional Spatial and Economic Strategy (RSES) for the Eastern and Midlands Regional Assembly area in accordance with section 13 of the Act.

The Office welcomes the policy approach to supporting Clondalkin's role in Dublin City and Suburbs and the Metropolitan Area Strategic Plan (MASP) and the support of the role of Clondalkin as a Decarbonising Zone and the wider approach to climate action in the proposed Variation.

The proposed Variation sets out a clear and detailed development planning framework for the development of the area over the lifetime of the plan. In particular, the Office welcomes the preparation of the chapter 8 Urban Design Strategy and the detailed Frameworks and Opportunity Sites, which include the Large Scale Framework and the Ninth Lock Road Framework Site, which will guide future development proposals for this identified land parcel. This will be one of the key sites for housing delivery at scale in the Clondalkin area.

The Office also welcomes the emphasis on the 10-minute neighbourhood concept and the supporting measures proposed in the proposed Variation, such as, improvements to sustainable transport, permeability, public realm, housing provision and the enhancement of social and community infrastructure to implement this concept. In this regard, the Office

strongly commends the significant efforts made in the preparation of the Local Transport Plan (LTP) in conjunction with the National Transport Authority (NTA) and Transport Infrastructure Ireland. The permeability measures and interventions proposed will help to overcome identified barriers and improve circulation around schools and the village centre at morning peak periods and will be particularly important on terms of providing safe and convenient routes for children to cycle or walk to school.

The Office also welcomes the chapter 4 Green Infrastructure, which aligns with the South Dublin's Green Infrastructure Strategy (GI Strategy) and the overall recognition that green infrastructure along with compact growth, sustainable travel, flood management and efficient use of land and associated infrastructure are essential components towards achievement of necessary climate action measures. In this regard it is appropriate that green infrastructure features across many sections including chapter 3 Climate Action and Infrastructure, chapter 6 Community, Homes and Employment, and chapter 8 Urban Design Strategy.

Notwithstanding the above, the Office has identified one area that requires further consideration prior to the adoption of the purposed Variation.

The submission below has been prepared to provide a strategic level input to your authority in finalising the proposed Variation. It is within the above context that the submission sets out one (1) observation under the following key theme:

Key theme	Recommendation	Observation
Flood risk management	-	Observation 1

1. Consistency with the Regional, Spatial and Economic Strategy

The Office considers the proposed Variation to be generally consistent with the regional policy objectives of the RSES. In this regard, the proposed Variation promotes compact sustainable growth and significant housing delivery across Clondalkin Local Planning Framework (LPF) area, which forms part of Dublin City and Suburbs in the MASP.

The draft LPF is also generally consistent with Regional Policy Objectives of the RSES for compact growth (RPO 3.2 and RPO 3.3), MASP sustainable transport (RPO 5.2 and RPO 5.3) and MASP housing and regeneration (RPO 5.4 and RPO 5.5).

2. Consistency with development plan and core strategy

The County Development Plan's core strategy identifies Clondalkin under the Dublin City and Suburbs Settlement Type and under the settlement name of Clondalkin, Clonburris and Grange Castle, with an identified capacity of undeveloped lands of 5,099 units. The majority of this capacity is within Clonburris Strategic Development Zone. The current potential within the LPF area lies largely within the large framework site along Ninth Lock Road and other smaller opportunity sites. The proposed Variation undertakes to monitor delivery of housing within the Clondalkin LPF to ensure that it aligns with the targets and related objectives set out in the core strategy. The Office is therefore satisfied that the proposed Variation is generally consistent with the County Development Plan, including its core strategy.

3. Compact growth, zoning and infrastructural services

All of the lands within the draft LPF boundary were zoned as part of the preparation of the County Development Plan. As such, the Office is satisfied that the land use zonings are consistent with RPO 3.2 (compact growth), RPO 4.1 (settlement strategy), RPO 5.2 and RPO 5.3 (MASP sustainable transport) of the RSES.

In accordance with RPO 5.1 (enabling infrastructure) of the RSES and section 4.5.2 of the Development Plans, Guidelines for Planning Authorities (2022) the Office is satisfied that there are sufficient infrastructural services in the area to cater for the projected growth of the LPF area.

4. Sustainable movement

The Office welcomes the preparation of the LTP using the Area Based Transport Assessment Advice Note (2018), which supports the integration of land use and transport planning by including a range of measures to improve sustainable transport.

The LTP indicates one of its key objectives is to promote a modal shift from private car to sustainable modes during the plan period. This will be essential to achieving national mandatory climate action targets to reduce greenhouse gas emissions by 51% by 2030.

The Planning Authority's commitment to improving opportunities for walking, cycling and public transport is clearly evident from the extensive work undertaken in the preparation of the LTP, which accompanies the proposed Variation. This assessment provides a clear

evidence base for policies and objectives, including active travel proposals, permeability measures, in the LPF. Modal Shift targets from the LTP are included in chapter 5 Sustainable Movement.

Of key importance in terms of the proposed mobility measures is providing safe and convenient routes for children to cycle or walk to school, and the Office especially commends the Planning Authority for the inclusion of these measures. The Office also notes the objectives for public consultation with the community at an individual project level and welcomes this approach.

In terms of national and regional policy, the policies and objectives to improve connectivity, permeability, enhance pedestrian and cycle movements, promote the 10-minute neighbourhood concept and improve modal shift and reduce vehicle movements, all demonstrate consistency with the Greater Dublin Area Transport Strategy 2022-2042, the Greater Dublin Area Cycle Network Plan (2022), the National Sustainable Mobility Policy (2022) and RPO 8.4 (integration of transport and land use planning) of the RSES.

5. Environment, natural and built heritage

The Office welcomes the approach of the Climate Action and Infrastructure chapter whereby the theme of climate action is integrated into all the themes of the LPF with policies and objectives crafted in a manner which contributes significantly towards addressing climate change and reducing the county's carbon emissions in a meaningful and tangible way. These overarching climate action principles align closely with the key action areas of the South Dublin Climate Action Plan 2024-2029, namely, Energy and Buildings, Transport, Flood Resilience, Resource Management and Nature based solutions.

Specifically, the Office supports the integration and implementation of the policies and provisions of the Climate Action Plan 2024 - 2029 in the preparation of the draft LPF (CA1: Climate Action).

The Office welcomes the policies and objectives in relation to chapter 4 Green Infrastructure, in particular to develop a multifunctional green infrastructure network using an ecosystem services approach, protecting, enhancing and further developing the identified interconnected network of parks, open spaces, natural features, protected areas, and rivers and streams that provide a shared space for amenity and recreation, biodiversity

protection, water quality, flood management and adaptation to climate change (GI1: Overarching).

The presentation of Gaps and Opportunities and Stepping Stones is a useful approach to achieving this GI Strategy. The strategic corridor of the Camac River is identified within the GI Strategy and an ambitious objective to deculvert the existing culverted Camac River at the Mill Shopping Centre, if the opportunity arises in the future, is noted, under GI1 Overarching Objective.

The Office welcomes the policies and objectives in the LPF for the protection and conservation of the built and cultural heritage of the plan area, in accordance with RPO 9.27 (heritage) of the RSES, and the inclusion of Policies CBH1 and CBH2 and CBH3 in relation to Architectural Conservation Area (ACA), Protected Structures and Structures on Architectural Heritage Interest to conserve archaeological heritage and protect recorded monuments from inappropriate development. These will ensure that the historic context and relevance of Clondalkin are protected over the lifetime of the LPF.

6. Flood risk management

A Strategic Flood Risk Assessment (SFRA) has been included as supporting documentation for the proposed Variation.

It is noted that the SFRA that uses the high end future scenario **1% AEP and 0.1% AEP** to define the flood zones for Clondalkin, and this approach is also used for the Plan Making Justification Test process. While this approach is consistent with flood zones in the County Development Plan, the Planning Authority should consider including the present-day flood risk mapping for Clondalkin to demonstrate the current predicted flood risk.

The proposed Variation also provides an opportunity to provide an integrated and area-based provision of Sustainable urban Drainage Systems and green infrastructure to avoid reliance on individual site by site solutions, particularly in respect of the Opportunity Sites.

Observation 1 – Flood risk management

Having regard to flood risk management, and in particular, the Planning System and Flood Risk Management Guidelines for Planning Authorities (2009) and the recently published LAWPRO's planning guidance on Implementation of Urban Nature-based

Solutions, Guidance Document for Planners, Developers and Developer Agents (2025), the Planning Authority is advised to:

- review opportunity sites with the Local Planning Framework area in the context of SuDS, where integrated and area-based provision of SuDS and green infrastructure can be incorporated in order to avoid reliance on individual site by site solutions; and
- include the present-day flood risk mapping for Clondalkin as a distinct layer within the Strategic Flood Risk Assessment to demonstrate the current predicted flood risk.

The Planning Authority is advised to consult with the Office of Public Works regarding this recommendation.

7. Urban design and Large Scale Development Frameworks

The Office welcomes the inclusion of chapter 8 Urban Design Strategy and its policies and objectives relating to Frameworks and Opportunity Sites. The Urban Design Principles for Village Centre Framework Area with emphasis on public realm, improvements, high quality design and placemaking and pedestrian priority with traffic calming measures are commended, as are Objectives EDE11 Objective 4 to protect the village core of Clondalkin and NCBH21 SLO 1 to protect and maintain the remaining old stone walls of Clondalkin.

The presentation of two Village Enhancement Schemes (VES) for the Ninth Lock to Old Nangor and Main Street with Design Parameters are welcomed inclusions.

In relation to the Large Scale Development Frameworks, the Ninth Lock Road Framework Site is a key component for housing delivery in the LPF, and strong development parameters in relation to placemaking, movement, green infrastructure and infrastructure are included.

The Knockmeenagh Framework Site is presented as having challenges and constraints due to existing land uses, primarily employment uses, access restrictions on the N7 and the presence of an established residential area, with associated ACA. The LPF acknowledges these constraints and considers that a mixed-use development would facilitate a more efficient and appropriate use of land, citing that the lands be maybe considered for rezoning as part of a separate variation to the County Development Plan in the future. The

Knockmeehangh Framework site has the potential to provide for housing at appropriate locations within this land bank, and the Office encourages the Planning Authority to bring forward its plans in this regard.

8. Implementation and monitoring

The Office welcomes the inclusion of chapter 9 Implementation and Monitoring as part of the LPF which sets out the implementation and phasing / timelines of relevant objectives and details the provision of an effective monitoring and evaluation system and funding streams.

Summary

The Office requests that your authority addresses the observation outlined above.

At the end of the process, your authority is required to notify this Office within **five working days** of the decision of the Planning Authority in relation to the proposed Variation.

Please feel free to contact the staff of the Office in the context of your authority's responses to the above, which we would be happy to facilitate. Contact can be initiated through plans@opr.ie.

Is mise le meas,



Anne Marie O'Connor

Deputy Regulator and Director of Plans Evaluation

Designated Public Official under the Regulation of Lobbying Act 2015